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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

VOYAGER DIGITAL HOLDINGS, INC. *et al.*¹

Debtors.

Chapter 11
Case No.: 22-10943 (MEW)

(Jointly Administered)

JOINT NOTICE OF APPEARANCE AND
DEMAND FOR NOTICES

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (N/A); and Voyager Digital, LLC (8013). The location of the Debtors' principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003.

PLEASE TAKE NOTICE that Emerald Ocean Isle, LLC, Amano Global Holdings, Inc., Shingo Lavine, and Adam Lavine by and through its attorneys, Law Offices of Douglas T. Tabachnik P.C., and Goldstein & McClintock, LLLP, hereby files this Joint Notice of Appearance and Request for Notices in this Title 11 case, pursuant to 11 U.S.C §§ 342 (if applicable in the event of conversion of this case to one under chapter 7) and 1109, and Rules 2002, 9007, and 9010(b), of the Federal Rules of Bankruptcy Procedure (“Bankruptcy Rules”), and respectfully requests that all notices given or required to be given, and all papers served or required to be served, in this case, and in all proceedings arising under or related thereto, be served upon the following as follows:

Douglas T. Tabachnik, Esq.
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PLEASE TAKE FURTHER NOTICE, that the foregoing demand includes not only notices and papers referred to in the rules specified above but also includes, without limitation, orders and notice of any application, motion, petition, pleading, request, complaint or demand,

whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail delivery, telephone, electronic means or otherwise, which affects the Debtor or the property of the Debtor, or the administration of the Debtor's bankruptcy case.

PLEASE TAKE FURTHER NOTICE that neither this Request for Service of Papers nor any subsequent appearance, pleading, claim or suit is intended or shall be deemed to waive the rights of Emerald Ocean Isle, LLC, Amano Global Holdings, Inc., Shingo Lavine, and Adam Lavine under the U.S. Constitution and applicable law, including, without limitation, (i) the right to have final orders entered only after *de novo* review by a federal district court judge; (ii) right to trial by jury in any proceeding or controversy so triable; (iii) right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) any and all other rights, claims, actions, defenses, setoffs or recoupments to which Emerald Ocean Isle, LLC, Amano Global Holdings, Inc., Shingo Lavine, and Adam Lavine is or may be entitled under agreements, prior court orders, Local Bankruptcy Rules, in law, or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are hereby expressly reserved.

Dated: July 28, 2022

By: /s/ Douglas T. Tabachnik
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